

<b>RETURN DATE: OCTOBER 19, 2021</b>	<b>:</b>	<b>SUPERIOR COURT</b>
<b>CAROL GUARINO</b>	<b>:</b>	<b>J.D. OF NEW HAVEN</b>
<b>VS.</b>	<b>:</b>	<b>AT NEW HAVEN</b>
<b>MADISON INTERFAITH RESIDENTIAL COMMUNITY, INC.</b>	<b>:</b>	<b>SEPTEMBER 10, 2021</b>

### **COMPLAINT**

1. The plaintiff, Carol Guarino (hereinafter, the “plaintiff”), was and still is a resident of the State of Connecticut with her place of residence being in the Town of Madison.

2. At all times mentioned herein, the defendant, Madison Interfaith Residential Community, Inc. (hereinafter, the “defendant”), was a Connecticut corporation licensed to do business in, and actively conducting business within, the State of Connecticut.

3. At all times mentioned herein, the defendant owned a property located at 70 Woodland Road in Madison, Connecticut (hereinafter, the “premises”).

4. At all times mentioned herein, the defendant controlled the premises.

5. At all times mentioned herein, the defendant maintained the premises.

6. On or about February 4, 2021, at approximately 8:00 a.m., the plaintiff was lawfully upon the premise.

7. At the same time and place, as the plaintiff exited apartment 7F and began walking down the area of the sidewalk connecting the entrance of apartment 7F to the parking lot (hereinafter, the “sidewalk”), she was caused to slip and fall down onto the sidewalk due to untreated ice/and or snow, sustaining bodily injury as a result (hereinafter, the “fall”).

8. The plaintiff’s fall and resulting injuries and losses were due to the negligence and carelessness of the defendant, it’s agents, servants, and/or employees, in one or more of the following ways:

- a. In that it/they had a duty to maintain the premises, including but not limited to the sidewalk, in a reasonably safe condition, yet failed to do so;
- b. In that it/they failed to inspect, or adequately inspect the premises, including but not limited to the sidewalk;
- c. In that it/they knew, or should have known, that an accumulation of snow and/or ice upon the sidewalk created an unsafe and dangerous condition for pedestrians, such as the plaintiff;
- d. In that it/they allowed or permitted an accumulation of snow and/or ice on the sidewalk over the course of several days, creating an unsafe and dangerous condition for pedestrians, such as the plaintiff;
- e. In that it/they failed to remove, or adequately remove, accumulated snow and/or ice from the sidewalk of the premises, creating an unsafe and/or dangerous condition for pedestrians, such as the plaintiff;
- f. In that it/they failed to apply, or adequately apply, salt, sand, and/or other abrasive materials to the sidewalk;
- g. In that it/they failed to warn, or adequately warn pedestrians, such as the plaintiff, that the sidewalk was in an unsafe and dangerous condition due to an accumulation of snow and/or ice; and
- h. In that it/they failed to ensure that the sidewalk was reasonably safe for pedestrians, such as the plaintiff.

9. As a result of the fall, the plaintiff suffered the following injuries and/or exacerbations of injuries, some of which injuries and/or exacerbations of injuries being permanent in nature:

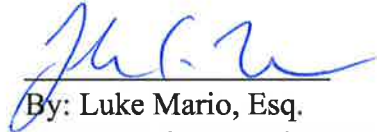
- a. Cervical sprain/strain with radiculopathy
- b. Lumbar sprain/strain

10. As a further result of her injuries, the plaintiff has experienced, and will continue to experience in the future, pain and suffering, an increased likelihood of future medical treatment and/or disorders, and fear and apprehension of such future medical treatment and/or disorders.

11. As a further result of her injuries, the plaintiff has incurred, and may continue to incur, medical expenses.

12. As a further result of her injuries, the ability of the plaintiff to pursue and enjoy life's leisure activities has been reduced.

THE PLAINTIFF  
Carol Guarino

A handwritten signature in blue ink, appearing to read "L. Mario", is written over a horizontal line.

By: Luke Mario, Esq.  
Carter Mario Law Firm  
100 Plains Road  
Milford, Connecticut  
Tel. No: 203-876-2711  
Juris No: 106160

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**PRAYER FOR RELIEF**

WHEREFORE, the plaintiff claims:

1. Monetary relief; and
2. Such other and further relief as the Court deems appropriate.

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**STATEMENT OF AMOUNT IN DEMAND**

The amount in demand is greater than \$15,000.00, exclusive of interest and costs.

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A handwritten signature in blue ink, appearing to read "J. C. M.", is written over a horizontal line.

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